

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

KRISTINA MIKHAYLOVA,

Plaintiff,

-against-

BLOOMINGDALE'S, INC., BLOOMINGDALE'S, INC. d/b/a BLOOMINGDALE'S AND FORTY CARROTS, BLOOMINGDALE'S, LLC, BLOOMINGDALE'S, LLC d/b/a BLOOMINGDALE'S NEW YORK, MACY'S, INC., MACY'S, INC. d/b/a MACY'S OF NEW YORK, UNITED STOREWORKERS RETAIL, WHOLESALE AND DEPARTMENT STORE UNION AFL-CIO LOCAL 3 a/k/a LOCAL 3 UNITED STOREWORKERS RWDSU/UFCW, DENNIS DIAZ, individually, CHRISTOPHER CASTELLANI, individually, RICHARD LAW, individually, and BOBBY BOOKER, individually,

Defendants.

Civil Action No. 1:19-cv-08927-GDB

**DECLARATION OF
MELISSA MENDOZA, ESQ.**

I, MELISSA MENDOZA, of full age, hereby state as follows:

1. I am an attorney at law of the State of New York and admitted to practice before this Court. I am an attorney with the law firm of Derek Smith Law Group, PLLC, the counsel of record for the Plaintiff, Kristina Mikhaylova ("Plaintiff") in this action. As such, I am fully familiar with the facts and circumstances contained herein.
2. This declaration is submitted in opposition to the Defendants' Reply in Support of Motion for Summary Judgment, pursuant to Rule 56 of the Federal Rules of Civil Procedure.
3. Annexed collectively hereto as **Exhibit 1** are true and correct copies of Defendants' Document Production, bates numbers BLM 754-806.

4. Annexed collectively hereto as Exhibit 2 are true and correct copies of the Supplemental Declaration of Plaintiff.

Pursuant to 28 U.S.C. §1746(2), I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Dated: October 31, 2023
New York, New York

/s/Melissa Mendoza

Melissa Mendoza